

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551 FDS

Hon. F. Dennis Saylor IV

**DECLARATION OF CHRISTOPHER SUN IN SUPPORT OF DEFENDANT GOOGLE
LLC’S OPPOSITION TO PLAINTIFF’S MOTION TO COMPEL**

I, Christopher Sun, upon my personal knowledge, hereby submit this declaration pursuant to 28 U.S.C. § 1746 and declare as follows:

1. I am an attorney at the law firm of Keker, Van Nest & Peters LLP. I represent Defendant Google LLC, (“Google”) in the above-captioned action.
2. Google produced the document marked at GOOG-SING-00240398, and attached as Exhibit D to the Declaration of Daniel McGonagle, Dkt. 634-2, (“McGonagle Declaration”), on July 5, 2021.
3. At no point prior to last month did Singular ask Google to produce any document linked to in the document marked at GOOG-SING-00240398, including the document subject to Plaintiff Singular Computing LLC’s motion to compel, Dkt. 634, (the “Hyperlinked Document”).
4. Counsel for Google does not know whether the Hyperlinked Document is the document marked at GOOG-SING-00027477, attached as Exhibit F to the McGonagle Declaration, and has not searched for or reviewed the Hyperlinked Document.

5. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from the deposition of Kamran Shafiei, taken on July 28, 2021.

6. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts from the Expert Report of Philip Green, dated December 22, 2022.

7. Attached hereto as **Exhibit 3** is a true and correct copy of the hearing transcript dated October 25, 2023.

8. Attached hereto as **Exhibit 4** is a true and correct copy of the hearing transcript dated July 18, 2023.

9. Attached hereto as **Exhibit 5** is a true and correct copy of the hearing transcript dated October 2, 2023.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on December 14, 2023 in San Francisco, California.

/s/ Christopher Sun

Christopher Sun

CERTIFICATE OF SERVICE

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail on the date of electronic filing.

/s/ Nathan R. Speed

Nathan R. Speed